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October 5, 2009

VIA ECF & FIRST CLASS MAIL

The Honorable Michael A. Shipp, U.S.M.J.
King Fed. Bldg. & U.S. Courthouse
50 Walnut Street, P.O. Box 999
Newark, New Jersey 07101-0999

Re: The Lautenberg Foundation, et al. v. Madoff
Civil Action No. 2:09-cv-00816 (SRC-MAS)

Dear Magistrate Judge Shipp:

Our firm, along with our co-counsel, Lankler Siffert & Wohl LLP, represent defendant Peter Madoff in the above-referenced matter. Enclosed for Your Honor's consideration is a proposed Stipulation extending the time for defendant Peter Madoff to answer the Complaint from October 7, 2009, to and including October 13, 2009. The proposed Stipulation has also been electronically filed with the Court.

If the proposed Stipulation meets with the Court's approval, we would appreciate it if Your Honor would execute same and have it entered on the docket.

Moreover, there is an in-person status conference currently scheduled before Your Honor on October 8, 2009 at 11:00 a.m. By way of this letter, we respectfully request that the status conference be adjourned as Mr. Spada's wife is due to give birth today. In this regard, counsel for plaintiffs and defendant are available on October 14, 2009 should that day be convenient for Your Honor.

{00588735.DOC}

We thank the Court for its consideration of these requests.

Respectfully submitted,

Michael J. Grohs

GRO/
Enclosure
cc: Michael R. Griffinger, Esq.
Ronald J. Riccio, Esq.
Greg Trif, Esq.
Louis A. Modugno, Esq.
Charles T. Spada, Esq.
Jeannie Rose Rubin, Esq.
[via First Class Mail – w/encls.]